

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEWELRY 47, INC.,

07 CV 8272 (PAC)

Plaintiff,

NOTICE OF CROSS  
MOTION

against

LARRY BIEGLER , ELOHIM FINANCIAL  
and DIONE TILLMAN,

Defendants.  
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PLEASE TAKE NOTICE that upon the annexed  
affirmations of PETER S. GORDON, GARY WEISS, GIL  
WEISS, JEFF DOWNEY and the handwriting expert, and the  
corrected press release, plaintiff will cross-move this Court  
pursuant to Rule 66 of the Federal Rules of Civil Procedure for the  
appointment of a receiver to take possession of the BAHIA  
EMERALD and for such other and further relief as to this Court  
may be deemed just and proper.

Dated: Forest Hills, New York,  
October 30, 2007

YOURS, etc.

/s/

PETER S. GORDON, (PSG 0068)  
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